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7 *Attorneys for Defendant/Counter-Defendant*  
8 *The PNC Financial Services Group, Inc. and*  
*Counter-Defendant PNC Bank, N.A.*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 RODNEY MOTT;

12 Plaintiff,

13 v.

14 THE PNC FINANCIAL SERVICES  
GROUP, INC.; SELECT PORTFOLIO  
15 SERVICING, INC.; TRINITY FINANCIAL  
SERVICES, LLC; RADIAN SERVICES,  
16 LLC; AND SPECIAL DEFAULT  
SERVICES, INC.;

17 Defendants.  
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CASE NO. 2:16-cv-01949-JCM-CWH

JOINT MOTION AND ORDER TO  
EXTEND DEADLINE

1 TROJAN CAPITAL INVESTMENTS, LLC;

2  
3 Counterclaimant(s)

4 v.

5 RODNEY MOTT; RADIAN SERVICES,  
6 LLC; THE PNC FINANCIAL SERVICES  
7 GROUP, INC.; BANK OF AMERICA, N.A.;  
8 SELECT PORTFOLIO SERVICING, INC.;  
9 WILMINGTON TRUST, NATIONAL  
10 ASSOCIATION, not in its individual  
11 capacity but solely as trustee under the  
12 Greenwich Investors XL Pass-Through  
13 Trust Agreement; DTA SOLUTIONS LLC;  
14 BSI FINANCIAL SERVICES INC.;  
15 DREAMBUILDER INVESTMENTS LLC;  
16 LAND HOME FINANCIAL SERVICES,  
17 LLC; and Also all other persons unknown  
18 claiming any right, title, estate, lien or  
19 interest in the real property described in  
20 the counterclaim adverse to  
21 counterclaimant's ownership in the  
22 referenced lien and note stated herein, or  
23 any cloud upon counterclaimant's title to  
24 the referenced lien and note herein  
25 inclusive;

26 Counter-defendant(s).

27  
28 Counter-Defendants PNC Financial Services Group, Inc. and PNC Bank, N.A.  
(collectively "PNC") and Counterclaimant Trojan Capital Investments, LLC  
("Trojan")(collectively with PNC, the "Parties"), by and through their counsel of  
record<sup>1</sup>, jointly move to extend the deadline for PNC to respond to Trojan's  
counterclaim (ECF No. 38). The parties state that:

<sup>1</sup> PNC Financial Services Group, Inc. ("PNC Financial") was named in the complaint, but was terminated from the case via a judgment entered on February 23, 2017 (ECF No. 37). Later, Trojan named PNC Financial in the counterclaim (ECF No. 38). Ballard Spahr, LLP now represents PNC Financial with respect to the counterclaim.

2. Subsequently, a Notice of Acceptance with Offer of Judgment was filed on February 22, 2017 (ECF No. 36) and a Judgment was entered against PNC Financial on February 23, 2017 (ECF No. 37).

3. On March 13, 2017, Trojan filed an amended answer and counterclaim, naming PNC as a counter-defendant (ECF No. 38).

4. PNC was personally served with the counterclaim and the deadline to respond to the counterclaim is April 20, 2017.

5. The Parties now stipulate and agree to extend PNC's deadline to respond to the counterclaim from April 21, 2017 to May 22, 2017.

6. This is the Parties' first request for extension of this deadline, which is not intended to cause any delay or prejudice to any party.

*[Continued on next page]*

7. The extension will allow PNC to fully investigate Trojan's allegations in the counterclaim so that PNC may appropriately respond thereto. The extension will also accommodate PNC counsel's schedule and conflicts.

Dated: April 20, 2017

Dated: April 20, 2017

**BALLARD SPAHR LLP**

**BURKE, WILLIAMS & SORENSEN, LLP**

By: /s/ Holly Ann Priest  
Joel E. Tasca  
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By: /s/ Richard J. Reynolds  
Richard J. Reynolds, Esq.  
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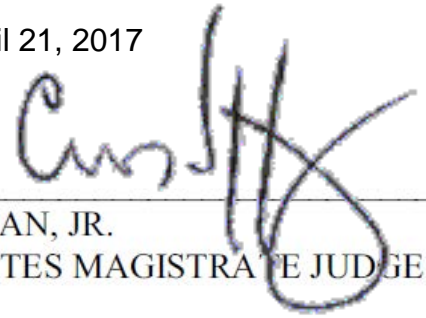
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*Attorneys for Counter-Defendants  
PNC Financial Services Group, Inc  
and PNC Bank, N.A.*

*Attorneys for Trojan Capital  
Investments, LLC*

IT IS SO ORDERED.

DATED: April 21, 2017

  
C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

BALLARD SPAHR LLP

By: /s/ Holly Ann Priest  
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*A Attorneys for Counter-Defendants  
PNC Financial Services Group, Inc  
and PNC Bank, N.A.*

**CERTIFICATE OF SERVICE**

Pursuant to Rule 5(b) of the Federal Rules of Civil Procedure, I HEREBY CERTIFY that on April 20, 2017, I served a true and correct copy of **JOINT MOTION AND ORDER TO EXTEND DEADLINE**, on the following parties by filing same with the Court's CM/ECF electronic filing system:

David H. Krieger Matthew I. Knepper Miles N. Clark HAINES & KRIEGER, LLC 8985 S. Eastern Avenue, Suite 350 Henderson, NV 89123 <i>Attorneys for Plaintiff/Counter-Defendant Rodney Mott</i>	Dana Jonathon Nitz Michael S. Kelley WRIGHT, FINLAY & ZAK, LLP 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 <i>Attorneys for Defendant/Counter-Defendant Select Portfolio Servicing, Inc.</i>
Michael R. Brooks BROOKS HUBLEY, LLP 1645 Village Center Circle, Suite 200 Las Vegas, NV 89134 <i>Attorney for Defendants Trinity Financial Services, LLC and Defendant/Counter-Claimant Trojan Capital Investments, LLC</i>	Richard J. Reynolds BURKE, WILLIAMS & SORENSEN, LLP 1851 East First Street, Suite 1550 Santa Ana, CA 92705 <i>Attorney for Defendant Trinity Financial Services, LLC; Special Default Services, Inc.; and Defendant/Counter-Claimant Trojan Capital Investments, LLC</i>
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/s/ C. Wells  
An employee of BALLARD SPAHR LLP